

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Civil Action No. 05-30117-KPN

KATHLEEN MILLER,
Plaintiff

v.

VERIZON COMMUNICATIONS INC.,
Defendant

PLAINTIFF'S EMERGENCY MOTION FOR ENLARGEMENT OF TIME (BY FOUR DAYS) TO SERVE AND FILE PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

NOW COMES the Plaintiff, Kathleen Miller, in the instant case, and respectfully requests that this Court allow her Emergency Motion For Enlargement Of Time (By Four Days) To Serve And File Plaintiff's Opposition To Defendant's Motion For Summary Judgment, from July 10, 2006 to July 14, 2006 for the following reasons:

1. The Plaintiff requests a brief, four-day enlargement of time within which to respond to the Defendant's Motion for Summary Judgment, given the numerous issues involved;
2. Counsel for the Plaintiff has recently attended several scheduled depositions, hearings, and mediations, as well as expended a significant amount of time preparing for five-day trial in Hampden County Superior Court;
3. At the present time, Counsel for the Plaintiff is down an associate attorney to assist him with scheduling matters, and is required to attend to all cases independently;
4. Counsel for the Plaintiff has worked nights, weekends, and the recent July 4, 2006 Holiday in an attempt to serve and file the Plaintiff's Opposition To Defendant's Motion

for Summary Judgment in a timely manner; however, various scheduling conflicts will make it very difficult the Plaintiff's Opposition To Defendant's Motion for Summary Judgment to be filed on July 10, 2006;

5. Counsel for the Defendant has expressed his general assent to this Motion, and the Plaintiff has forwarded a copy of the same to Counsel for the Defendant for review. However, Counsel for the Defendant has not responded as to whether the wording of the Motion is acceptable as drafted. As this is an emergency Motion and several attempts have been made to receive a response from Counsel for the Defendant, and given that the Plaintiff's Opposition is currently due on Monday, July 10, 2006, Counsel for the Plaintiff filed the instant Motion with the Court; and
6. No further request will be made for an enlargement of time to serve and file the Plaintiff's Opposition To Defendant's Motion For Summary Judgment.

WHEREFORE, the Plaintiff respectfully requests that this Court grant the within Motion to extend the time to serve and file her summary judgment opposition by four days from July 10, 2006 to July 14, 2006.

Respectfully submitted:

The Plaintiff
KATHLEEN MILLER

By: /s/ Michael O. Shea
Michael O. Shea, Esq.
BBO No. 555474
Counsel for the Plaintiff
Law Office Of Michael O. Shea, P.C.
451 Main Street
Wilbraham, MA 01095
Telephone No.: (413)596-8005
Facsimile No.: (413)596-8095

Dated: July 7, 2006